REMARKS/ARGUMENTS

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow. Claims 1-4, 7, and 10-20 have been amended. Claims 1-25 are now pending in the present application.

I. Claim Rejections Under 35 U.S.C. § 102(b)

In Section 12 of the Office Action, Claim 1-3 and 6 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,842,185 to Chancey et al. (Chancey). Applicants respectfully traverse the rejection because Chancey fails to teach, suggest, or describe at least "associating the financial document with a folder, the folder being one of a plurality of folders defined by a customer user associated with the first account to organize a plurality of financial documents" as required by claim 1.

On pages 5-6 of the Office Action, the Examiner states:

> Regarding Claim 1, Chancey discloses ... associating the financial
> information with a folder in the first system, (See column 5, lines
> 16-23 ...), ...

Applicants respectfully disagree. Chancey states that a "financial statement incorporating the transactions is provided in an electronic form understood by the computer, such as a computer data file, for updating the financial account." (Abstract, emphasis added through underlining). Chancey further states:

> One form of the method includes determining from the electronic
> statement if a payee for a transaction is of record in the computer
> and, if so, assigning the transaction to a category already associated
> with the payee. Another form of the method includes determining
> from the electronic statement a merchant category code such as a
> Standard Industry Code (SIC). The merchant category code is
> associated with a category recognized by the computer, and the
> transaction is assigned to the recognized category. If no recognized
> category exists, the method may prompt a user for selection of a
> category for association with the merchant category code.

(Col. 2, lines 23-34, emphasis added through underlining). At Col. 5, lines 16-23, cited by the Examiner, Chancey further states:

> In this event, the user is prompted to select a category for association with the merchant category code (step 50). This selection may either be an unrecognized category suggested by the process or a recognized category chosen by the user from a list of recognized categories. If the unrecognized category is selected, the process adds it to the list of recognized categories.

Assigning a category code to <u>a transaction included in a financial document</u> is clearly distinct from associating a financial document with a folder. Chancey provides no teaching whatsoever for how documents, or a plurality of financial statements, are organized. Chancey is directed to categorizing transactions contained within a single document. Therefore, Chancey fails to teach, suggest, or disclose at least "associating the financial document with a folder, the folder being one of a plurality of folders defined by a customer user associated with the first account to organize a plurality of financial documents" as required by claim 1. An anticipation rejection cannot properly be maintained where the reference used in the rejection does not disclose all of the recited claim elements. Claims 2-9 depend from claim 1. Therefore, Applicants respectfully request withdrawal of the rejection of claims 1-3 and 6.

II.   Claim Rejections Under 35 U.S.C. § 102(e)

On page 7, section 17, Claims 10-21 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2004/0254881 to Kumar et al. (Kumar). Applicants respectfully traverse the rejection because Kumar fails to teach, suggest, or describe at least "an on-line environment" as required by claim 10, and "means, at the first computer, for associating the financial document with a folder, the folder being one of a plurality of folders, wherein the plurality of folders are defined by a customer user associated with the first account to organize a plurality of financial documents" as required by claim 15.

On pages 7-9 of the Office Action, the Examiner states:

> Regarding Claim 10, Kumar discloses ... wherein the host computer provides an on-line environment ... (See page 3,

paragraph [0026] …), …. And regarding hierarchy see page 21, paragraph [0232] …,

Whereby searches can be done across folders. (See page 3, paragraph [0028] ….)

Applicants respectfully disagree. Kumar states that a "transaction module having a summary interface is provided as part of a software suite for enabling viewing and manipulation of multiple categories of aggregated data compiled from a plurality of data sources and accessible through a single interfacing node …." (Abstract). At paragraphs [0027] and [0030], Kumar states:

> a secondary interface accessible from interaction within the main interface contains a plurality of interactive menus, the menus containing selectable options for categorical viewing of transaction history. The selectable options enable viewing transactions by a specific account, a specified timeframe, and by a selected category. Additionally, the options are selectable for ordering combinations of criteria for producing a transaction view, wherein the transaction view comprises an ordered history view.

> In preferred aspects of the method in step (b), the categorical criteria for viewing transactions include account, timeframe, and by category including food and beverage, utilities, home, auto, charitable contribution, and entertainment.

Thus, Kumar describes sorting transactions based on categorical criteria. Kumar does not teach "a hierarchy of folders defined by the customer user, wherein each folder in the hierarchy of folders includes a financial document." At paragraph [0232], cited by the Examiner, with emphasis added through underlining, Kumar states:

> It is noted herein that a user may arbitrarily change a category associated with any line item by simply interacting with the drop-down menus such as menu 315, and selecting an alternate category. …. By selecting one of the basic categories, transactions are sorted and displayed according to that category. By selecting one of the subcategories associated with the basic category, transactions are sorted and displayed according to that subcategory.

Assigning a category code to a line item included in a transaction history is clearly distinct from a hierarchy of folders defined by the customer user, wherein each folder in the

hierarchy of folders includes a financial document and also from associating a financial document with a folder. Kumar provides no teaching whatsoever for documents organized into folders. Kumar further does not search across folders, but instead sorts rows in a transaction history based on categories. This is a distinct functionality as shown in Figs. 11-14 of the present invention. Therefore, Kumar fails to teach, suggest, or disclose all of the limitations required by claims 10 and 15. An anticipation rejection cannot properly be maintained where the reference used in the rejection does not disclose all of the recited claim elements. Claims 11-14 depend from claim 10, and claims 16-25 depend from claim 15. Therefore, Applicants respectfully request withdrawal of the rejection of claims 10-21.

III. Claim Rejections Under 35 U.S.C. § 103(a)

A. Rejection of Claims 4 and 5 Under 35 U.S.C. § 103(a)

On page 14, section 31, Claims 4 and 5 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Chancey as applied to Claim 1 above, and further in view of U.S. Patent No. 6,792,422 to Stride et al. (Stride). Applicants respectfully traverse this rejection because the Examiner has failed to present a prima facie case of obviousness. MPEP § 2143 states:

> To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

The Examiner has failed to demonstrate that Chancey and Stride, alone or in combination, disclose, teach, or suggest all of the claim limitations as recited in claims 4 and 5.

As discussed in Section I., Chancey fails to teach at least "associating the financial document with a folder, the folder being one of a plurality of folders defined by a customer user associated with the first account to organize a plurality of financial documents" as required by claim 1. Stride fails to remedy this failure.

Stride teaches:

Automatic <u>categorization of a financial transaction</u> based upon a mapping of useful characters from the transaction's description to a financial category. The description of the financial transaction is parsed to identify one or more useful strings of characters. A data file of business names is then searched for a match with the parsed string or strings from the transaction description. .... If a match is found in the business name data file, then the transaction is categorized according to the corresponding business name to financial category mapping. Otherwise, the transaction may be categorized based upon a match found in a database of financial transaction description keywords

(Abstract, emphasis added through underlining). Identifying a categorization for <u>a financial transaction</u> is clearly distinct from associating a financial document with a folder. Stride provides no teaching whatsoever for how documents, or a plurality of financial statements, are organized. Stride is directed to automatically categorizing transactions. Therefore, Chancey and Stride fail to disclose, to teach, or to suggest all of the claim limitations as recited in claim 1. An obviousness rejection cannot be properly maintained where the references used in the rejection do not disclose all of the recited claim elements. Therefore, Applicants respectfully request withdrawal of the rejection of claims 4 and 5, which depend from claim 1.

B.   Rejection of Claims 7 and 8 Under 35 U.S.C. § 103(a)

On page 16, section 34, Claims 7 and 8 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Chancey as applied to Claim 1 above, and further in view of Kumar. Applicants respectfully traverse this rejection because the Examiner has failed to present a prima facie case of obviousness. As discussed in Sections I. and II., Chancey and Kumar fail to teach at least "associating the financial document with a folder, the folder being one of a plurality of folders defined by a customer user associated with the first account to organize a plurality of financial documents" as required by claim 1. An obviousness rejection cannot be properly maintained where the references used in the rejection do not disclose all of the recited claim elements. Therefore, Applicants respectfully request withdrawal of the rejection of claims 7 and 8, which depend from claim 1.

C.   Rejection of Claim 9 Under 35 U.S.C. § 103(a)

On page 18, section 37, Claim 9 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Chancey as applied to Claim 1 above, and further in view of U.S. Patent No. 6,792,422 to Bacha et al. (Bacha). Applicants respectfully traverse this rejection because the Examiner has failed to present a prima facie case of obviousness. The Examiner has failed to demonstrate that Chancey and Bacha, alone or in combination, disclose, teach, or suggest all of the claim limitations as recited in claim 9.

As discussed in Section I., Chancey fails to teach at least "associating the financial document with a folder, the folder being one of a plurality of folders defined by a customer user associated with the first account to organize a plurality of financial documents" as required by claim 1. Bacha fails to remedy this failure.

Bacha teaches that "[w]hen an electronic document is made available for review by other entities, it is often convenient to store the document in a repository or database managed by a third party." (Abstract). Bacha provides no teaching whatsoever for how documents are organized. Therefore, Chancey and Bacha fail to disclose, to teach, or to suggest all of the claim limitations as recited in claim 1. An obviousness rejection cannot be properly maintained where the references used in the rejection do not disclose all of the recited claim elements. Therefore, Applicants respectfully request withdrawal of the rejection of claim 9, which depends from claim 1.

D.   Rejection of Claims 22, 24, and 25 Under 35 U.S.C. § 103(a)

On page 19, section 38, Claims 22, 24, and 25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kumar as applied to Claim 15 above, and further in view of U.S. Patent No. 6,574,377 to Cahill et al. (Cahill). Applicants respectfully traverse this rejection because the Examiner has failed to present a prima facie case of obviousness. The Examiner has failed to demonstrate that Kumar and Cahill, alone or in combination, disclose, teach, or suggest all of the claim limitations as recited in claims 22, 24, and 25.

As discussed in Section II., Kumar fails to teach at least "associating the financial document with a folder, the folder being one of a plurality of folders defined by a customer user associated with the first account to organize a plurality of financial documents" as required by claim 15. Cahill fails to remedy this failure.

Cahill teaches "[a] method and apparatus for storing and retrieving images of documents, e.g. checks." (Abstract). Cahill provides no teaching whatsoever for how documents are organized. Therefore, Kumar and Cahill fail to disclose, to teach, or to suggest all of the claim limitations as recited in claim 15. An obviousness rejection cannot be properly maintained where the references used in the rejection do not disclose all of the recited claim elements. Therefore, Applicants respectfully request withdrawal of the rejection of claims 22, 24, and 25, which depend from claim 15.

E.   Rejection of Claim 23 Under 35 U.S.C. § 103(a)

On page 21, section 42, Claim 23 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Kumar in view of Cahill as applied to Claim 22 above, and further in view of U.S. Patent Publication No. 2005/0246541 to Ginter et al. (Ginter). Applicants respectfully traverse this rejection because the Examiner has failed to present a prima facie case of obviousness. The Examiner has failed to demonstrate that Kumar, Cahill, and Ginter, alone or in combination, disclose, teach, or suggest all of the claim limitations as recited in claim 23.

As discussed in Section II., Kumar fails to teach at least "associating the financial document with a folder, the folder being one of a plurality of folders defined by a customer user associated with the first account to organize a plurality of financial documents" as required by claim 15. As discussed in Section III.D., Cahill also fails to teach at least this limitation of claim 15. Ginter fails to remedy this failure.

Ginter teaches that "[d]ocuments and other items can be delivered electronically from sender to recipient with a level of trustedness approaching or exceeding that provided by a personal document courier." (Abstract). Ginter provides no teaching whatsoever for how documents are organized. Therefore, Kumar, Cahill, and Ginter fail to disclose, to teach, or to

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suggest all of the claim limitations as recited in claim 15. An obviousness rejection cannot be properly maintained where the references used in the rejection do not disclose all of the recited claim elements. Therefore, Applicants respectfully request withdrawal of the rejection of claim 23, which depends from claim 15.

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 50-2350. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 50-2350. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 50-2350.

Respectfully submitted,

Date   April 9, 2007   By _____

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